

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

COOPERVISION, INC.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 06-239 (SLR)
)	
CIBA VISION CORP.,)	
)	
Defendant.)	
)	

**STIPULATION AND ORDER CONCERNING PRODUCTION OF DOCUMENTS
FROM RELATED LITIGATIONS**

IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court, that defendant CIBA Vision Corporation (“CIBA”) shall, within twenty-one days of the entry of this Order, produce for inspection and copying by Plaintiff CooperVision, Inc. (“CooperVision”) all documents in CIBA’s possession that have been produced, served, or filed in all previous legal proceedings involving the Nicolson patent family (which includes United States Patent Nos. 5,849,811, 5,760,100, 5,776,999, 5,789,461, 5,965,631, 6,951,894, as well as foreign counterpart applications and patents).

CIBA shall also provide a copy of this order within five days after its entry to third parties whose confidential information CIBA has been ordered to produce. If any third party files an objection with this Court to the production of its confidential information within 21 days of the entry of this Order, CIBA need not produce documents containing that third party’s confidential information for inspection and copying until the Court has ruled on that objection.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

YOUNG CONAWAY STARGATT & TAYLOR LLP

/s/ Rodger D. Smith II (#3778)

Jack B. Blumenfeld (#1014)

Rodger D. Smith II (#3778)

1201 N. Market Street

P.O. Box 1347

Wilmington, DE 19899

(302) 658-9200

rsmith@mnat.com

Attorneys for Plaintiff CooperVision, Inc.

/s/ Karen L. Pascale (#2903)

Josy W. Ingersoll (#1088)

Karen L. Pascale (#2903)

The Brandywine Building

100 West Street, 17th Floor

P.O. Box 391

Wilmington, DE 19899-0391

(302) 571-6554

kpascale@ycst.com

Attorneys for Defendant CIBA Vision Corporation

SO ORDERED this _____ day of _____, 2007.

UNITED STATES DISTRICT JUDGE

971814